



FIRST: Denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraphs 1 through 12 except admits the allegations of paragraph 12 that he has a brother named Mohinder, a nephew named Mandeep and a son named Arween.

SECOND: Denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 13.

THIRD: Admits the allegations of paragraph 14 except denies that he is known by names other than his own, denies that he is the owner or operator of HLC, and denies that he is or was an owner, officer, director, employee and/or agent of SARDAR SITC, or AL TAMASOK.

FOURTH: Denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 15-23, except denies that he owns or operates the companies referred to.

FIFTH: Denies each and every allegation of paragraph 24.

SIXTH: Denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 25 and 26.

AS TO THE FIRST CAUSE OF ACTION

SEVENTH: Repeats each response to the paragraphs realleged in paragraph 27.

EIGHTH: Denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 28 through 51.

AS TO THE SECOND CAUSE OF ACTION

NINTH: Repeats each response to the allegations realleged in paragraph 52.

TENTH: Denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 53 through 62.

AS TO THE THIRD CAUSE OF ACTION

ELEVENTH: Repeats each response to the allegations realleged in paragraph 63.

TWELFTH: Denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 64 through 114, except denies the allegations of paragraphs 81-83 as alleged against him, denies the allegations of paragraph 104 that he new about or authorized the acts of HLC and Parker, denies the allegations of paragraph 106 as alleged against him, admits the allegations of paragraphs 109-11, denies the allegations of paragraph 112, and denies the allegation in paragraph 113 that he received any of the funds, and denies the allegation of paragraph 114 that he is liable to Maersk

AS TO THE FOURTH CAUSE OF ACTION

THIRTEENTH: Repeats each response to the allegations realleged in paragraph 115

. FOURTEENTH: Denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 116 and 117, except denies the allegation of paragraph 116 that Maersk is entitled to collect freight from him and denies the allegation in paragraph 117 that he conducted fraudulent litigation, and denies liability to Maersk.

AS TO THE FIFTH CAUSE OF ACTION

FIFTEENTH: Repeats each response to the allegations realleged in paragraph 118.

SIXTEENTH: Denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 119 through 126, except denies the allegations of paragraph 123 and denies the allegations of paragraph 126 as alleged against him.

AS TO THE SIXTH CAUSE OF ACTION

SEVENTEENTH: Repeats each response to the allegations realleged in paragraph 127.

EIGHTEENTH: Denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 128 through 135, except denies the allegations of paragraphs 128 and 129 as alleged against him.

AS TO THE SEVENTH CAUSE OF ACTION

NINETEENTH: Repeats each response to the allegations realleged in paragraph 136.

TWENTIETH: Admits the allegations of paragraph 137, admits the allegations of paragraph 138 that ASS, MANDEEP, MSS, and JSS, together with others, constitute a family, and otherwise denies the allegations of that paragraph, and denies the allegations of paragraphs 139 through 142.

MARITIME ATTACHMENT

TWENTY-FIRST: Repeats each response to the allegations realleged in paragraph 143.

TWENTY-SECOND: Denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 144 and 145.

WHEREFORE, defendant Joginder Singh Sahni demands judgment dismissing the complaint and all of the claims alleged in it, together with the costs and disbursements of this action.

Dated: New York, N.Y.  
April 10, 2008



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